

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,
OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI HOLDINGS,
LLC,

Defendants.

No. 1:23-cv-11195-SHS-OTW

DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Section IV of this Court's Individual Practices in Civil Cases, OpenAI Defendants ("OpenAI") seek leave to file under seal certain portions of their concurrently filed response to Plaintiff's Letter Motion to Compel the addition of seventeen OpenAI custodians. For the reasons stated in OpenAI's accompanying memorandum of law, which is also submitted in support of OpenAI's Response to Plaintiff's Motion for Leave to File Under Seal, and articulated in more detail in the supporting declaration, OpenAI respectfully requests the Court grant its motion for leave to file under seal.

Dated: August 15, 2024

Respectfully Submitted,

By: /s/ Michelle S. Ybarra

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